

**LOCAL BANKRUPTCY FORM 9013-3**

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

**IN RE:**

LEONARD RAY NEIL, JR.

**CHAPTER** 13

**CASE NO.** 1 - 17 .bk- 01324-HWV

**Debtor(s)**

LEONARD RAY NEIL, JR.

**ADVERSARY NO.**     -     ap-             
(if applicable)

**Plaintiff(s)/Movant(s)**

**vs.**

FREEDOM MORTGAGE CORPORATION

**Nature of Proceeding:** Objection to

Certificate of Default

CHARLES J. DEHART, III, ESQUIRE  
STANDING CHAPTER 13 TRUSTEE

**Defendant(s)/Respondent(s)**

**Document #:**                                 

**REQUEST TO CONTINUE HEARING/TRIAL WITH CONCURRENCE<sup>1</sup>**

This request must be filed at least twenty-four (24) hours prior to the hearing. All requests must be approved by the Court. Submitting a request is not an automatic continuance.

The undersigned hereby requests a continuance with the concurrence of the opposing party (parties). This is a first request for a continuance.<sup>2</sup>

Reason for the continuance.

Debtor(s) and Freedom Mortgage Corporation are in the process of settling the matter.

Contemporaneous with the filing of this request, the undersigned has served a copy of this request upon all counsel participating in this proceeding.

Dated: 03/24/2021

/s/ Paul D. Murphy-Ahles

Attorney for Debtor(s)

Name: Paul D. Murphy-Ahles

Phone Number: (717) 975-9446

<sup>1</sup> No alterations or interlineations of this document are permitted.